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Application GRANTED. The initial pretrial conference currently scheduled for May 1, 2024 is hereby ADJOURNED to **June 26, 2024**, at **9:00 a.m.** Plaintiff shall file a status update regarding his efforts to effect service on Defendants no later than **June 14, 2024**. The Clerk is directed to terminate ECF No. 16.

April 19, 2024

**Via ECF**

Hon. Jesse M. Furman, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Jesse M. Furman', is written over the text 'SO ORDERED.' and the date 'April 19, 2024'.

April 19, 2024

**Re: Taurus Bartlett, p/k/a "Polo G" v. J. Noah B.V. and Jozef Wanno, Case No. 23-CV-10345 (JMF)**

Dear Judge Furman:

We are counsel for Plaintiff Taurus Bartlett, professionally known as "Polo G."

We write to respectfully request an adjournment of the initial pretrial conference that is presently scheduled for May 1, 2024, as well as an adjournment of the concomitant deadline to file a joint letter and a Civil Case Management Plan and Scheduling Order.

Plaintiff seeks this adjournment because service of process has not yet been completed upon Defendants J. Noah B.V. and Jozef Wanno (the "Defendants").<sup>1</sup> Defendants are based in the Netherlands and refused to accept service of process. Accordingly, we have engaged a vendor, ABC Legal Services, Inc., to serve the Defendants with process in the Netherlands via the Hague Convention. As explained in the Declaration of Sophia Mailhos that we previously filed with the Court (ECF No. 15-1), we have been told that the Central Authority in the Netherlands received and acknowledged our request for service of process. As the Declaration of Ms. Mailhos further explains, we are now waiting for the service documents to be returned to the Central Authority by the Dutch bailiff. *Id.*

We remain hopeful that service of process will be completed through the Hague Convention. However, if we are unable to do so, we intend to move the Court to authorize an

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<sup>1</sup> If granted, this request would not affect any other deadlines in this action. This is our second request for an extension of this deadline. Our prior request (which was made on the same ground that service of process has not yet been completed) was granted by the Court. As Defendants have not yet been served with process, they are not in a position to consent or object to this request.

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alternative form of service on Defendants. *See Jian Zhang v. Baidu.com Inc.*, 293 F.R.D. 508 (S.D.N.Y. 2013) (Furman, J.) (authorizing a Chinese defendant to be served through its United States counsel pursuant to Fed. R. Civ. P. 4(f)(3)).

We appreciate the Court's consideration of this matter.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jeffrey M. Movit', is positioned above the printed name.

Jeffrey M. Movit

cc: Jozef Wanno  
(Via Email)